



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES
ATTORNEY GENERAL

DIVISION OF STATE COUNSEL
LITIGATION BUREAU

Writer Direct: (518) 776-2288

July 25, 2023

Honorable David N. Hurd
United States District Judge
Alexander Pirnie Federal Bldg. and U.S. Courthouse
10 Broad Street
Utica, NY 13501

Re: *Goodall, Shawn v. Department of Corrections and Community Supervision, et al.*
Northern District of New York
19-CV-1359 (DNH)(CFH)

Dear Judge Hurd:

Defendants object to Plaintiff's belated request for a 14-page extension of the page limit for their reply to Defendants' opposition to their summary judgment motion.

To the extent that Plaintiff's counsel references needing this page extension to respond to Plaintiff's opposition papers, Plaintiff's submissions to date related to these motions have been extensive and voluminous, consisting of over 120 exhibits, two memorandums of law totaling 63 pages, and a 45 page, 190 paragraph Statement of Material Facts. Because Defendants complied with the Local Rules in submitting their Reply papers, it would be inequitable, and Defendants would be clearly prejudiced, if the Court were to allow the Plaintiff to submit a Reply that is more than twice the page limit allowed by the Local Rules at this stage of the proceedings.

Thank you for your consideration of this matter.

Respectfully yours,

s/ Stacey Hamilton

Stacey Hamilton
Assistant Attorney General
Bar Roll No. 510484
Stacey.Hamilton@ag.ny.gov

cc: Plaintiff's counsel via ecf